

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

Santana Bryson and Joshua Bryson,
as Administrators of the
Estate of C.Z.B., and as surviving
parents of C.Z.B., a deceased minor,

Plaintiffs,

v.

Rough Country, LLC

Defendant.

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Civil Action File

No. 2:22-cv-17-RWS

**[PROPOSED]
CONSENT ORDER**

This Consent Order is based on the parties' agreed resolution of certain pretrial issues.

The parties have agreed that they will not make any suggestion, statement, or argument, ask any question of witnesses or the jury panel, or offer any evidence or demonstrative about the following topics.

1. When Plaintiffs hired a lawyer, filed their complaint, or the amount they have contracted to pay her lawyers. Rough Country cannot make any statement or argument about the time, circumstances, or manner under

which Plaintiffs employed their attorneys.

2. Collateral source benefits. The parties agree that they will not introduce evidence, solicit testimony, or reference payments to Plaintiffs from collateral sources, including Medicaid, health insurance, or automobile insurance.
3. Cars driven by lawyers. The parties agree that they will not introduce evidence, solicit testimony, or reference the vehicles that the lawyers drive or whether they are equipped with suspension lifts.
4. C.Z.B being improperly restrained or his car seat being improperly installed or defective. The parties agree that they will not introduce evidence, solicit testimony, reference, or suggest that C.Z.B. was not properly restrained, or his car seat was not properly installed, or his car seat was defective.
5. The lift kit was installed improperly. The parties agree that they will not introduce evidence, solicit testimony, reference, or suggest that the lift kit was installed improperly.
6. Any reference to offers of settlement or compromise by the parties.
7. Any reference to marketing materials of the parties' lawyers.
8. Any reference to the fact that Plaintiffs' counsel has represented other

people in cases against automotive companies.

Further, the parties have agreed to the sequestering of witnesses (other than Plaintiffs or Rough Country's representative) during the trial.

IT IS SO ORDERED, this ____ day of _____, 2025.

RICHARD W. STORY
United States District Judge